

EXHIBIT 28

Verzilli Consulting Group, Inc.

Consulting Economists

Office Address:
411 North Broad Street
Lansdale, PA 19446

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January 27, 2022

Jonathan Feinberg, Esquire
Kairys, Rudovsky, Messing, Feinberg, & Lin, LLP
The Cast Iron Building
Suite 501 South
718 Arch Street
Philadelphia, PA 19106

Re: Estate of Charles Freitag, Sr.

Dear Mr. Feinberg:

The following is our analysis of the values of the losses in lifetime earning capacity (net of personal maintenance), relative to Charles Freitag. Mr. Freitag passed away on August 25, 2018.

The estimates presented are based on Civil Rights damage guidelines.

Documents Reviewed

- Amended Complaint
- Income Tax Returns : 2015-2018
- Thrift Savings Plan 2016 Annual Statement
- Various Publications/Source Documents

Background

Charles Freitag, Sr. was born on August 31, 1960. At the time of his death, he was 57.98 years of age, with an average statistical life expectancy of an additional 23.3 years (Life Tables, 2017 : from age 58).

Mr. Freitag had been employed with the United States Postal Service from October, 1993 to the time of his passing. Mr. Freitag's earnings with the USPS from 2015 to 2018 were as follows:

2015	\$78,980
2016	\$73,322
2017	\$61,622
2018	\$46,012

Mr. Freitag had been sentenced to serve in prison for a period of 6 to 12 years on August 24, 2018.

Mr. Freitag is survived by his son, Charles Freitag, Jr.

Methodology

Lifetime Earning Capacity

Given 1) Mr. Freitag's background/experience and 2) economic principles, we have estimated lifetime earning capacity to be \$71,308 annually. This figure is based on his average earnings from 2015 to 2017.

At this time, we have presented estimates of lifetime earning capacity assuming that Mr. Freitag would have returned to his employment with the USPS, based on the following release dates:

Age 64	(Serve 6 years)
Age 66	(Serve 8 years)
Age 70	(Serve 12 years)

Duration of Estimates

Earning capacity is estimated to the date that Charles Freitag, Sr. would have attained 72.

This assumption, as a measure of earning capacity, considers 1) the fact that there is no mandatory retirement age in the United States, 2) that labor force participation for the older population has been increasing (Older Workers : Labor Force Trends and Career Options) and 3) data from the Journal of Forensic Economics relative to labor force participation and retirement trends.

Future Growth

Based on data from 1) Congressional Budget Office (Budget and Economic Outlook) and 2) research regarding USPS historical wage growth, future wage growth has been estimated to be 2.0% annually.

Personal Maintenance

Based on data from the Consumer Expenditure Survey, and available research ("Personal Consumption and Single Persons" : Journal of Forensic Economics) personal maintenance expenses have been estimated to be 37% of earnings (including un-reimbursed expenses)

Personal maintenance has been estimated consistent with the guidelines set forth in the McClinton v. White decision. That is, PA guidelines consider that personal maintenance represents the reasonable expenses for food, shelter, clothing, transportation, medical care and some recreation that enables individuals to produce income. Further, personal maintenance is not total consumption, and therefore, the net losses presented do not represent savings.

Benefits

The value of employer-provided benefits is a component of an individual's earning capacity. Mr. Freitag received employer-provided benefits with the USPS, that included health insurance and retirement contributions (FERS & TSP matching). Based on 1) information provided and 2) data from www.opm.gov, we have estimated the value of employer-provided benefits to be 27.3% of earnings.

Earning Capacity

Earning capacity may be defined as that level of income, which an individual may reasonably be expected to receive from work given that individual's age, level of educational attainment, particular skills and talents, actual earnings and work history, intentions, and the supply and demand conditions in the labor market relative to the individual's realistic employment choices. It should be noted that the realization of earning capacity (utilization of earnings) may be a function of both economic and non-economic factors and is not a measure of potential earning capacity.

Discount Rate

The present values of future earnings have been estimated based on a discount rate of 3.0%. This discount rate is based on the average yield on short-term treasury securities over the past twenty years (www.treas.gov : adjusted for recent low yields), as well as forecasts provided by the Congressional Budget Office. In our opinion, this discount rate represents a reasonable rate of return for a riskless investment.

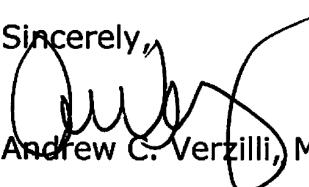
Summary of Opinions

Based upon the methodology discussed and the information provided to date, we have estimated the loss in earning capacity (net of personal maintenance) relative to Charles Freitag, Sr., to be in the range of \$116,586 to \$480,595.

The opinions presented are within a reasonable degree of economic certainty. We reserve the right to revise our analysis if additional information is provided that impacts on the data and assumptions utilized.

The following pages are detailed summary tables of the estimates. If you have any questions, please contact us.

Sincerely,



Andrew C. Verzilli, M.B.A.

Joseph Freitag, Sr.

Table 1 : Loss in Earning Capacity : Ages 64 to 72

PV : Future Earning Capacity	\$	532,220	[\$71,308 Annually : Age 64]
Less Personal Maintenance	\$	(196,922)	[37% of Earnings]
Loss in Employer-Benefits	\$	145,296	[27.3% of Earnings]
Total Future Loss	\$	<u>480,595</u>	

Joseph Freitag, Sr.

Table 2 : Loss in Earning Capacity : Ages 66 to 72

PV : Future Earning Capacity	\$	395,168	[\$71,308 Annually : Age 66]
Less Personal Maintenance	\$	(146,212)	[37% of Earnings]
Loss in Employer-Benefits	\$	<u>107,881</u>	[27.3% of Earnings]
Total Future Loss	\$	<u>356,836</u>	

Joseph Freitag, Sr.

Table 3 : Loss in Earning Capacity : Ages 70 to 72

PV : Future Earning Capacity	\$	129,110	[\$71,308 Annually : Age 70]
Less Personal Maintenance	\$	(47,771)	[37% of Earnings]
Loss in Employer-Benefits	\$	<u>35,247</u>	[27.3% of Earnings]
Total Future Loss	\$	<u>116,586</u>	

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Verzilli Consulting Group, Inc.
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Rule 26 Disclosure

Re: Joseph Frietag, Sr.

- Fee for Preparation of Economic Report \$300 per hour
- Fee for Trial Testimony \$1,950 per day
- Fee for Deposition Testimony \$350 per hour
- CV/Testimony List See Attached

Freitag001504

JA0000321

ANDREW C. VERZILLI, M.B.A

CURRICULUM VITAE

411 North Broad Street
Lansdale, PA 19446

Office: (215) 368-7797
Email: andrew.verzilli@gmail.com

Education

December 1991	Master's Degree in Business Administration La Salle University, Philadelphia, PA Major: Finance
June 1988	Bachelor of Science Degree in Business Administration Drexel University, Philadelphia, PA Majors: Economics & Management of Information Systems

Experience

Verzilli Consulting Group, Inc./ Verzilli & Verzilli and Consultants, Inc. (Andrew G. Verzilli, Ph.D. & Associates : June 1988 to Present)
Principal & Economist (June 1994 to Present)

- Provide economic and financial analysis in the preparation of reports for litigation in various jurisdictions involving:
 - Earning Capacity Estimates
 - Business Valuations
 - Statistical Analysis
 - Pension Valuations
 - Structured Settlement Valuations
 - Medical Care Costs
- Provide economic and financial analysis for small businesses and municipalities
- Provide Analysis of Collective Bargaining Agreements for Townships and Police Organizations
- Expert testimony has been provided in State and Federal courts, including the following jurisdictions:
 - Federal District Courts:
 - Eastern/Middle District of PA, District of NJ, Eastern/Southern District of NY, West Palm Beach FL, Orlando FL, Southern District of OH, Southern District of IN,

District of Maryland, District of Arizona, and Western District of NC.

- Various Commonwealth Courts in Pennsylvania:
 - Adams County, Allegheny County, Beaver County, Berks County, Bucks County, Cambria County, Carbon County, Centre County, Chester County, Dauphin County, Delaware County, Erie County, Fayette County, Franklin County, Kent County, Lackawanna County, Lancaster County, Lehigh County, Luzerne County, Lycoming County, Monroe County, Montgomery County, Northampton County, Northumberland County, Philadelphia County, Potter County, Susquehanna County, Washington County, Wyoming County, York County.
- Various Commonwealth Courts in New Jersey:
 - Atlantic County, Burlington County, Camden County, Gloucester County, Jersey City, Mercer County, Middlesex County, Monmouth County, Morris County.
- Other Commonwealth Courts:
 - City of Norfolk, VA; Fairfield County, CT; Kings County, NY; Linn County, IA; Monroe County, IA; Maricopa County, AZ; Montgomery County, MD; New Castle County, DE; New York County, NY; Norfolk, VA; Sussex County, DE.

Teaching

Drexel University, Department of Economics
Adjunct Instructor (January 1992 to April 1999)

- Instructor in Principles of Macroeconomics and Principles of Microeconomics (Undergraduate Day & Evening College)
- Student course evaluations were consistently above the average for the Department of Economics
- Highest student course evaluations in Department of Economics for Fall Term, 1993

Other Experience

Andrew G. Verzilli, Ph.D. & Associates (Philadelphia, PA)
Apprentice Economic Analyst Work Manager
(co-op employment through Drexel University)

- Provided assistance and support in the preparation of economic reports involving personal earning capacity estimates for litigation in various jurisdictions. Assisted in the valuation of structured settlements and pension plans
- Coordinated business operations

General Services Administration (Philadelphia, PA)

Assistant System Manager

(co-op employment through Drexel University)

- Maintained databases for the Federal Protection and Safety Division, and assisted in the development of computer training programs for division employees
- Assisted in the development of a networked computer system for GSA. Responsible for the maintenance of mini-computer system and applications

Research & Presentations

“Jimmynomics, Reaganomics, Georgienomics: What’s Next?” (with Verzilli, A.G.; Swift, T.; Donato, C; et al.) - Paper presented at the Pennsylvania Economic Association Annual Conference, May, 1991. Published in PEA Annual Proceedings, 1991.

“Real Interest Rates and Economic Growth: An Historical Perspective” - Paper presented at the Pennsylvania Economic Association Annual Conference, June, 1992. Published in PEA Annual Proceedings, 1992.

“Agenda for Economic Growth” (with Verzilli, A.G.; Swift, T.; Donato, C.; Collons, K; et al.) Paper presented at the Pennsylvania Economic Association Annual Conference, June, 1992. Published in PEA Annual Proceedings, 1992.

“The Effect of Tax Policy and Productivity” (with Verzilli, A.G.; Swift, T.; Donato, C; Collons, K; et al.) Paper presented at the Pennsylvania Economic Association Annual Conference, June. 1992. Published in PEA Annual Proceedings, 1992.

“Estimating Earning Capacity and Other Valuation issues – Why Use an Economist” Presentation with Verzilli, A.G.; Post & Schell Seminar, April 16, 1993 (Philadelphia, PA).

“Social Security: Who Will Pay (2000 and beyond)?” - Paper presented at the Pennsylvania Economic Association Annual Conference, May, 1993. Published in PEA Annual Proceedings, 1993.

“Our Past Presidents Wonder: Is Clintonomics the Light at The End of the Tunnel?” (with Verzilli, A.G.; Beachel, J.; Swift, T; Collons, K; et al.) Paper presented at the Pennsylvania Economic Association Annual Conference, May, 1993. Published in PEA Annual Proceedings, 1993.

“The Economist Can Not Estimate the Value of Hedonic Damages” - Paper presented at the Pennsylvania Economic Association Annual Conference, May, 1994. Published in PEA Annual Proceedings, 1994.

“Clintonomics – Good Morning? – Good Night? – or Good Bye” (with Verzilli, A.G.; Collons, K; Donato, C; Swift, T; et al.) Paper presented at the Pennsylvania Economic Association Annual Conference, May, 1994. Published in PEA Annual Proceedings, 1994.

“Executive Compensation & Productivity – Are Executives Worth Their Salaries?” (with C. Won-Martinez) Paper presented at the Pennsylvania Economic Association Annual Conference, May, 1994. Published in PEA Annual Proceedings, 1994.

“The Impact of Corporate Downsizing in The Northeast” (with C. Wong-Martinez) Presented at the PEA Conference, June, 1995.

“The Economics of Railroad Retirement Pensions” (with C. Donato) Presented at the PEA Conference, June, 1995.

“The Impact of Slander on the Profitability of a Firm” - Presented at the PEA Conference, June, 1996.

“Examining Medical & Non-Medical Experts in Civil Litigation” - Presented at the Lancaster County Bar Association, June 2001. Published in The Pennsylvania Bar Institute, 2001.

“Economic Issues in Pennsylvania Courts” - Presentation at the Lancaster County Bar Association, May, 2005.

“Economics in Civil Litigation” - Presented at the Bucks County Bar Association Monthly Civil Litigation Meeting, March, 2009.

“Presenting and Defending Catastrophic Injury Claims” (Presentation at the Pennsylvania Bar Institute: CLE, October, 2011. Published in The Pennsylvania Bar Institute, PBI No. 2011-6943.

“How Juries View Tractor Trailer Accidents” - Presented at the Pennsylvania Bar Institute: CLE, August, 2012. Published in The Pennsylvania Bar Institute, PBI No. 2012-7353.

Presenting as an Economic Expert at the Committee for Justice for All: CLE Seminar (April, 2017).

“Litigating the Traumatic Brain Injury Case” - Presented at the Pennsylvania Bar Institute: CLE, March, 2019. Published in The Pennsylvania Bar Institute, PBI No. 2019-10689.

Guest Lecturer at Temple University, Beasley School of Law. (Advanced Trial Advocacy, September 2015-present)

Association Membership & Non-Profit Organizations

National Association of Forensic Economics American Economic Association

Lansdale Little League President (August, 2004 to August, 2007)
Cannoneers Baseball: Trustee (2007-2011)
Lansdale Catholic High School Asst. Varsity Baseball Coach (2009-2010)

Awards

General Services Administration Outstanding Performance (college)
General Services Administration Certificate of Achievement (college)

Testimony List for Andrew C. Verzilli, M.B.A.: 2017

1

<u>Month</u>	<u>Docket</u>	<u>Plaintiff</u>	<u>Court</u>
January	09-100-3603	<i>Ulmer</i>	Philadelphia County, PA
January	4-14-CV-00576	<i>Wagner</i>	Lycoming County, PA
January	2011-08120	<i>Bracey</i>	Bucks County, PA
January	01-C-14-040385	<i>Folk</i>	(deposition)
February	2015-3664	<i>Howe</i>	Luzerne County, PA
February	130700720	<i>Harmon</i>	Philadelphia County, PA
February	MID-L-3642-13	<i>Johnson</i>	(deposition)
February	CAM-L-1332-15	<i>Budden</i>	(deposition)
February	SML-L-73-14	<i>Felder</i>	(deposition)
March	140900689	<i>Garfunkle</i>	Philadelphia County, PA
March	L-4933-14	<i>Crisp</i>	(deposition)
March	2011-2443	<i>Barbosa</i>	Delaware County, PA
March	MRS-L-1734-14	<i>Mikalic</i>	Philadelphia County, PA
April	2014-06810	<i>Miller</i>	Bucks County, PA
April	150702733	<i>Irvin</i>	(deposition)
April	2014-C-4032	<i>Albarracin</i>	Lehigh County, PA
April	CV-2015-008437	<i>Hardy</i>	Delaware County, PA
April	CAM-L-1901-14	<i>Yatauro</i>	(deposition)
May	N12C-10-213 AML	<i>Parker</i>	(deposition)
May	16-2554	<i>Robonson</i>	(deposition)
May	06-C-14-067847	<i>Boyle</i>	(deposition)
June	2014-C-2951	<i>Davis</i>	Lehigh County, PA
June	CL-15-04801	<i>Snader</i>	Lancaster County, PA
June	2014-9763	<i>Schaffner</i>	Luzerne County, PA
June	4648-14	<i>Tischler</i>	(deposition)
July	160300893	<i>Michalec</i>	Philadelphia County, PA
July	16-CV-3362	<i>Lichtenberger</i>	Lackawanna County, PA
July	2012-07258	<i>Pagano</i>	Bucks County, PA
July	CI-12-04140	<i>Murray</i>	Lancaster County, PA
July	2011-05029	<i>Lukyanova</i>	Arbitration
July	1:15-cv-005130YK	<i>Jay</i>	(deposition)
July	L-202-15	<i>Taraskus</i>	Camden County, NJ
August	2011-24642	<i>Kaminski</i>	Bucks County, PA
August	3:13-CV-01912-FLW-TJB	<i>Dunham</i>	(deposition)

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Testimony List for Andrew C. Verzilli, M.B.A.: 2017

2

August	3:13-CV-01912-FLW-TJB	<i>DeShong</i>	(deposition)
August	CV 30089	<i>Baker</i>	(deposition)
August	L-798014	<i>Roberts</i>	(deposition)
August	3:CV-16-1477	<i>Tarapchak</i>	(deposition)
September	15-S-16	<i>Stoner</i>	Adams County, PA
September	CV2014-052911	<i>Cisneros</i>	(deposition)
September	2011-11753	<i>Zabresky</i>	Arbitration
September	L-1863-14	<i>Harrison</i>	(deposition)
October	CAM-L-1901-14	<i>Yatauro</i>	Camden County, NJ
October	2011-374 C.P.	<i>Supancik</i>	Susquehanna County, PA
October	160201414	<i>Plumber</i>	Philadelphia County, PA
October	16-2746	<i>Blasick</i>	Delaware County, PA
October	160603475	<i>Dorsey</i>	Philadelphia County, PA
November	ATL-L-2099-15	<i>Veloso</i>	(deposition)
November	2015-11211	<i>Bednarek</i>	Luzerne County, PA
November	14-CIV-6636	<i>Golden</i>	New York County, NY
December	13-C-104175	<i>Phansaithong</i>	(deposition)
December	L225-16	<i>Lowe</i>	(deposition)
December	160602865	<i>Butterbaugh</i>	(deposition)
December	L-4796-13	<i>Stewart</i>	(deposition)

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Testimony List for Andrew C. Verzilli, M.B.A.: 2018

1

<u>Month</u>	<u>Docket</u>	<u>Plaintiff</u>	<u>Court</u>
January	2:16-CV-04472	<i>Biss</i>	(deposition)
January	2016-002545	<i>Gordon</i>	Delaware County, PA
February	15C-4019	<i>Pickens</i>	(deposition)
February	5:12-06189	<i>Schwartz</i>	(deposition)
February	L-005351-14	<i>Abbot</i>	(deposition)
February	2016 CIV 1881	<i>Macosky</i>	Luzerne County, PA
February	2011 CV 478	<i>Arvonio</i>	Lackawanna County, PA
March	150304396	<i>Forte</i>	(deposition)
March	0195	<i>Coughlin</i>	Philadelphia County, PA
March	2013-CV-2410	<i>Casey</i>	Lackawanna County, PA
March	160401238	<i>Duczkowski</i>	(deposition)
March	04219	<i>Simmons</i>	(deposition)
April	2014-7543	<i>Mills</i>	Northampton County, PA
April	160401238	<i>Duczkowski</i>	Philadelphia County, PA
April	04219	<i>Simmons</i>	Philadelphia County, PA
April	150304396	<i>Forte</i>	Philadelphia County, PA
April	L-4427-15	<i>Rad</i>	(deposition)
May	16-CV1572	<i>Kern</i>	(deposition)
May	ESX-L-1663-16	<i>Price</i>	(deposition)
May	00383	<i>Creighton</i>	Philadelphia County, MD
May	CI-12-03765	<i>Goldstein</i>	Lancaster County, PA
May	2013-8944	<i>Cragle</i>	Luzerne County, PA
June	15-15591	<i>Pizzuto</i>	Berks County, PA
June	160803209	<i>Demnicki</i>	Philadelphia County, PA
June	151103681	<i>Timmonds</i>	Philadelphia County, PA
June	MER-L-1863-14	<i>Harrison</i>	Mercer County, NJ
June	150702501	<i>Lallo</i>	Philadelphia County, PA
June	2016-2400	<i>Nazarak</i>	Centre County, PA
June	2016-2317	<i>Mihalacki</i>	Cambria County, PA
June	1S00068440	<i>Pires</i>	(deposition)
July	2:16-CV-02868	<i>Thompson</i>	(deposition)
July	FST-CV-16-6029461-S	<i>Amparo</i>	(deposition)
July	4502 CIVIL 2009	<i>Warters</i>	Monroe County, PA
July	SOM-L-1269-15	<i>Jalan</i>	(deposition)
July	CIV. No. ELH-17-804	<i>HV Baptist Church</i>	(deposition)
July	15 CV 850	<i>Trudnak</i>	Lackawanna County, PA

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Testimony List for Andrew C. Verzilli, M.B.A.: 2018

2

August	2015-25238	<i>Alizadehtazi</i>	Montgomery County, PA
August	2016-CV-7032MM	<i>Webb</i>	Cambria County, PA
September	12-001458	<i>Cork</i>	Delaware County, PA
September	1:16-CV-03937-JKB	<i>Logue</i>	(deposition)
September	2017-03157	<i>Rothenbecker</i>	Luzerne County, PA
September	15-07651	<i>White</i>	Chester County, PA
October	2013-15159; 2013-16676	<i>Griffin</i>	Montgomery County, PA
October	2013-6858	<i>Nilles</i>	Luzerne County, PA
October	C.A. No. 17-133 (JFB/SRF)	<i>Bryson & Connolly</i>	(deposition)
October	15-009603	<i>Madara</i>	Delaware County, PA
November	2014-06989	<i>Patel</i>	Bucks County, PA
November	3:17-CV-1096-BRM-LHG	<i>Ning</i>	Federal Court, NJ
November	2016-00120	<i>Johnson</i>	Montgomery County, PA
December	CAM-L-3973-16	<i>Marino</i>	(deposition)
December	2016-05187	<i>Jackson</i>	Luzerne County, PA

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Testimony List for Andrew C. Verzilli, M.B.A.: 2019

1

<u>Month</u>	<u>Docket</u>	<u>Plaintiff</u>	<u>Court</u>
January	LAC086879	<i>Stevens</i>	(deposition)
January	2016-005797	<i>Smith</i>	Delaware County, PA
January	2:18-cv-00702	<i>Holly</i>	(deposition)
January	217-2016-CV-00144	<i>Martin/Markland</i>	(deposition)
February	6515 of 2016	<i>Nikisher</i>	Luzerne County, PA
February	CAM-L-1346-15	<i>Olson</i>	(deposition)
February	1703-003692	<i>Johnson</i>	Philadelphia County, PA
February	1607-00671	<i>Savo</i>	Philadelphia County, PA
March	14 CV 1488	<i>Kochis</i>	Lackawanna County, PA
March	L-3957-14	<i>Johnson</i>	(deposition)
March	1:18-cv-01014	<i>Warner</i>	(deposition)
March	426387-V	<i>Bent</i>	(deposition)
March	1609-00082	<i>Deleso</i>	Philadelphia County, PA
April	14-000179	<i>Costello</i>	Luzerne County, PA
April	1704-03305	<i>Long</i>	Philadelphia County, PA
April	3:16-CV-00412-RDM	<i>Mercurio</i>	Middle District, PA
April	CV2016-054532	<i>Holderead</i>	(deposition)
April	FST-CV-16-6029461-S	<i>Amparo</i>	Fairfield County, CT
May	1610-03086	<i>Sullivan</i>	Philadelphia County, PA
May	426387-V	<i>Bent</i>	Montgomery County, MD
May	MRS-L-2476-16	<i>Nemec</i>	Morris County, NJ
May	18-CV-00341	<i>Robinson</i>	(deposition)
May	C0048-CV-2014-11272	<i>Stallard</i>	Northampton County, PA
June	DC-002196-19	<i>Czarnecki</i>	(deposition)
June	2:17-CV-13664-CCC-JBC	<i>Mohammed</i>	(deposition)
July	LACV086879	<i>Stevens</i>	Linn County, IA
July	1507-02501	<i>Lallo</i>	Philadelphia County, PA
August	2015-08383	<i>Yabut</i>	Bucks County, PA
August	2015-07319	<i>DiStefano</i>	Bucks County, PA
August	18-CV-03520	<i>Diawara</i>	(deposition)
August	CAM-L-3353-17	<i>Streater</i>	Camden County, NJ
August	L-3008-17	<i>Ruiz</i>	(deposition)
September	1709-0787	<i>Miller</i>	Philadelphia County, PA
September	CL-185309-00	<i>Harlan</i>	City of Norfolk, VA
September	2017-02258	<i>Steinhauser</i>	Montgomery County, PA
September	2017-C-3130	<i>Wagstaff</i>	Lehigh County, PA

Freitag001514

JA0000331

Testimony List for Andrew C. Verzilli, M.B.A.: 2019

2

September	1367-CV-2011	<i>Dogan</i>	Monroe County, PA
October	2011-33055	<i>Wilson</i>	Montgomery County, PA
October	CAM-L-2218-17	<i>Mills</i>	(deposition)
October	1711-2322	<i>Marcantonio</i>	Philadelphia County, PA
October	17-CV-00052	<i>Hollander</i>	(deposition)
October	CAM-L-1222-17	<i>O'Connell</i>	Camden County, NJ
November	1806-00712	<i>McGee</i>	Philadelphia County, PA
November	3:18-cv-00171 (VLB)	<i>Trifiletti</i>	(deposition)
December	83-cv-2018	<i>Kanyuck</i>	Monroe County, PA
December	1612-2392	<i>Allen</i>	Philadelphia County, PA
December	2:17-CV-04612-PHX-GMS	<i>Jones</i>	(deposition)

Freitag001515

JA0000332

Testimony List for Andrew C. Verzilli, M.B.A.: 2020

1

<u>Month</u>	<u>Docket</u>	<u>Plaintiff</u>	<u>Court</u>
January	180301039	<i>Avent</i>	Philadelphia County, PA
January	2:15-cv-02713-SDW-LDW	<i>Trzaska</i>	(deposition)
January	CV13-3545	<i>Grosso</i>	USDC EDNY
February	2016-7556	<i>Rafferty</i>	Delaware County, PA
February	CL16000388-00	<i>Ewing</i>	(deposition)
February	18-CV-4996	<i>Kowalski</i>	Lackawanna County, PA
February	01-CV-2018-9018080.00	<i>Powell</i>	(deposition)
March	466413-V	<i>Moran</i>	(deposition)
March	2011-SU-001971-82	<i>Santana-Vazquez</i>	York County, PA
May	MID-L-002997-17	<i>Malucelli</i>	(deposition)
June	CAM-L-4269-17	<i>Clark</i>	(deposition)
June	L-1203-17	<i>Montenegro</i>	(deposition)
September	2016-09769-TT	<i>Pennock</i>	Chester County, PA
September	3:18-cv-197-RJC	<i>Rhyne</i>	USDC WDNC
September	53C01-1604-CT-000790	<i>Gill</i>	(deposition)
October	18 CV 930	<i>Loomis</i>	Lackawanna County, PA
October	2:19-cv-04266-GJP	<i>Dean</i>	(deposition)
October	885 of 2016	<i>Kletcho</i>	Fayette County, PA
October	18 CV 3284	<i>Cunney</i>	(deposition)
October	12CV000283	<i>Mudra</i>	Bradford County, PA
November	1:17-cv-910-GLR	<i>ARIEL Synagogue</i>	USDC District of MD
November	2017-07608-MJ	<i>McClintock</i>	Chester County, PA
November	L-372-17	<i>Decker</i>	(deposition)
November	MID-L-001470-17	<i>Kent</i>	(deposition)

Freitag001516

JA0000333

Testimony List for Andrew C. Verzilli, M.B.A.: 2021

1

<u>Month</u>	<u>Docket</u>	<u>Plaintiff</u>	<u>Court</u>
February	CAM-L-001661-18	<i>Dietl</i>	(deposition)
February	GLO-L-00493-19	<i>Campbell</i>	(deposition)
March	18-CV-03520	<i>Diawara</i>	USDC EDPA
March	2018-10279	<i>Reed</i>	Chester County, PA
April	5:19-CV-05292-JFL	<i>McMahon</i>	(deposition)
April	16-01959	<i>Grieco</i>	(deposition)
April	N17C-02-236 VLM	<i>Permint</i>	(deposition)
May	CV2018-051819	<i>Devore</i>	(deposition)
May	3:19-cv-20567	<i>Hatchett</i>	(deposition)
May	2018 CV 8679	<i>Traynor</i>	Dauphin County, PA
May	MON-L-4531-17	<i>Kwon</i>	(deposition)
May	1705 04655	<i>Woodall</i>	Philadelphia County, PA
May	1710 02728	<i>Estwick</i>	Philadelphia County, PA
June	1705 00721	<i>Yasovsky</i>	Philadelphia County, PA
June	1:18-cv-1536	<i>Plunkard</i>	USDC MDPA
June	1805 00769	<i>Yoder</i>	Philadelphia County, PA
June	1601 01221	<i>Dearden</i>	Philadelphia County, PA
June	ESX-L-2221-19	<i>Rider</i>	(deposition)
July	3:15-cv-02443	<i>Davis Javitz</i>	USDC MDPA
July	ATL-L-000425-18	<i>Playo</i>	(deposition)
July	N19C-05-080 VLM	<i>Papillo</i>	(deposition)
August	2:20-cv-03000	<i>Kissinger</i>	USDC EDPA
August	2011-374 C.P.	<i>Supancik</i>	Susquehanna County, PA
August	1708 03246	<i>Meszaros</i>	Philadelphia County, PA
August	480810-V	<i>Bortz</i>	(deposition)
August	ATL-L-0065-19	<i>Buonanno</i>	(deposition)
September	2020-01267-PL	<i>Weaver</i>	Chester County, PA
September	ESX-L-8656-17	<i>McGaheran</i>	(deposition)
September	2018-59866	<i>Phan-Kramer</i>	First Judicial District of PA
September	MON-L-3240-17	<i>Merritt</i>	(deposition)
October	1710-3536	<i>Garced</i>	Philadelphia County, PA
October	3:20-cv-00087-RDM	<i>Jacob</i>	(deposition)

Freitag001517

JA0000334

Testimony List for Andrew C. Verzilli, M.B.A.: 2021

2

November	HNT-L-272-18	<i>Middleton</i>	(deposition)
November	ATL-L-000481-19	<i>Kancy</i>	(deposition)
November	2:19-cv-01539	<i>Ralston</i>	(deposition)

Freitag001518

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